

Croft, P.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARYLEBONE PCC LIMITED—ROSE 2
FUND ON BEHALF OF ITSELF AND ALL
SIMILARLY SITUATED PERSONS,

Plaintiff,

vs.

MILLENNIUM GLOBAL INVESTMENTS,
LTD.; MILLENNIUM ASSET
MANAGEMENT, LTD.; MICHAEL R.
BALBOA; GLOBEOP FINANCIAL
SERVICES, LTD.; BCP SECURITIES LLC;
XYZ CORP.

Defendants.

USDC SDNY
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DATE FILED: 4-29-13

Case No. 1:12-CV-03835-PAC

STIPULATION AND ~~PROPOSED~~
ORDER

**STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANT BCP
SECURITIES LLC TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S
AMENDED COMPLAINT**

WHEREAS Plaintiff Marylebone PCC Limited – Rose 2 Fund (“Plaintiff”) filed its
Complaint on or about May 14, 2012;

WHEREAS Defendants Millennium Global Investments Limited and Millennium Asset
Management Limited (together, “Millennium”), GlobeOp Financial Services, Ltd. (“GlobeOp”),
and BCP Securities LLC (“BCP”) agreed to answer, move, or otherwise respond to the Complaint
on or before July 31, 2012, pursuant to a court-ordered stipulation among the parties;

WHEREAS on July 25, 2012, Plaintiff and Millennium, GlobeOp, and BCP signed a Stipulation Extending Time for Defendants to Answer, Move, or Otherwise Respond to the Complaint to no later than November 2, 2012;

WHEREAS Plaintiff filed an amended complaint on August 31, 2012 (the "Amended Complaint");

WHEREAS on October 22, 2012, Plaintiff and BCP signed a Stipulation Extending Time for BCP to Answer, Move, or Otherwise Respond to the Amended Complaint no later than November 21, 2012;

WHEREAS on November 19, 2012, Plaintiff and BCP signed a Stipulation Extending Time for BCP to Answer, Move, or Otherwise Respond to the Amended Complaint no later than January 31, 2013;

WHEREAS BCP and Plaintiff have reached a settlement;

WHEREAS on December 20, 2012, the Plaintiff filed a Motion for Preliminary Approval of Settlement with BCP ("Motion");

WHEREAS the Court has not yet ruled on the Motion; and

WHEREAS this is BCP's fourth request for adjournment of the time to respond to the Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, that:

(1) In light of the pending Motion, BCP shall have up to and including September 5, 2013 to answer, move, or otherwise respond to the Amended Complaint; and

(2) This Stipulation and Proposed Order is being filed for scheduling purposes, does not seek any relief from the Court, and does not waive any rights or defenses (including but not limited to personal jurisdiction defenses) that BCP may have with respect to the Complaint or Amended Complaint.

Dated: New York, New York
April 29, 2013

ZAMANSKY & ASSOCIATES LLC

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Attorneys for BCP Securities LLC

SO ORDERED, this 29 day of April, 2013

Paul A. Crotty
The Honorable Paul A. Crotty
United States District Judge